# PacifiCorp - Stakeholder Feedback Form

# 2019 Integrated Resource Plan

PacifiCorp (the Company) requests that stakeholders provide feedback to the Company upon the conclusion of each public input meeting and/or stakeholder conference calls, as scheduled. PacifiCorp values the input of its active and engaged stakeholder group, and stakeholder feedback is critical to the IRP public input process. PacifiCorp requests that stakeholders provide comments using this form, which will allow the Company to more easily review and summarize comments by topic and to readily identify specific recommendations, if any, being provided. Information collected will be used to better inform issues included in the 2019 IRP, including, but not limited to the process, assumptions, and analysis. In order to maintain open communication and provide the broader Stakeholder community with useful information, the Company will generally post all appropriate feedback on the IRP website unless you request otherwise, below.

				Date of Submittal 8/12/2019		
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*Organization:	Resource Advocates, Idaho Conservation					
	League					
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Public Meeting Date comments address: Click here to enter date		⊠ C	heck here if not rel	lated to specific meeting		
List additional organization attendees at cited meeting: Click here to enter text.						
*IRP Topic(s) and/or Agenda Items: List the specific topics that are being addressed in your comments.  Click here to enter text.						
☐ Check here if any of the following information being submitted is copyrighted or confidential.						
☐ Check here if you do <b>not</b> want your Stakeholder feedback and accompanying materials posted to the IRP website.						
*Respondent Comment: Please provide your feedback for each IRP topic listed above.						
The following comments and data requests are submitted on behalf of Powder River Basin Resource Council, Western						
Resource Advocates, and Idaho Conservation League						

Comment & Data Request #1: Coal Supply Contracts:

1.a) Please respond explaining how PacifiCorp is modeling future coal supply contract costs for the Colstrip, Naughton, and Dave Johnston units given recent coal company bankruptcies, purchases of mining operations, and renegotiation timeframes for coal supply contracts.

# **PacifiCorp Response:**

PacifiCorp models future coal supply pricing in the Integrated Resource Plan (IRP) for the following requested plants as follows:

- Colstrip contract provisions through the term of the coal supply agreement together with estimated inflation adjusted pricing,
- Naughton contract provisions through the term of the coal supply agreement together with estimated inflation adjusted pricing,
- Dave Johnston contract provisions through the term of the coal supply agreements together with independent price forecasts provided by third-party publications and consulting services.

<sup>\*</sup> Required fields

1.b) Please respond if PacifiCorp is modeling a range of possible future costs for coal supply and if so please provide the basis for those modeling assumptions.

# **PacifiCorp Response:**

PacifiCorp has modeled future cost for coal supply based on numerous scenarios dependent upon different plant life assumptions. Plant life changes affect the coal supply volume requirements. Changes in volume may affect coal supply pricing depending on the plant life assumptions modeled in a given scenario.

1.c) Please also respond with a table of all coal supply contract end dates currently in place for all coal units.

#### **PacifiCorp Response:**

PacifiCorp does not disclose competitive market contract terms and conditions where such disclosure could harm customers' economic benefit in future contract negotiations. As such, please see PacifiCorp's United States Energy Information Administration (EIA) 923 reporting available on the EIA website at: eia.gov/electricity/.

Comment & Data Request #2: Coal Combustion Residuals:

2.a) Please respond explaining how PacifiCorp is modeling costs associated with cleanup and closure of coal combustion residuals (CCR) facilities.

### **PacifiCorp Response:**

Clean up and closure costs of coal combustion residual facilities are modeled as part of decommissioning cost assumptions for each unit.

2.b) Please explain if the costs associated with proposed alternative remedies identified in the Corrective Measures Assessments currently out for public comment have been incorporated into the 2019 IRP analysis. If so, please provide the basis for those cost assumptions.

## **PacifiCorp Response:**

The anticipated costs associated with PacifiCorp's proposed remedies identified in the Corrective Measures Assessments are incorporated into the 2019 IRP analysis. Please see response to 2(a).

**Data Support:** If applicable, provide any documents, hyper-links, etc. in support of comments. (i.e. gas forecast is too high - this forecast from EIA is more appropriate). If electronic attachments are provided with your comments, please list those attachment names here.

Corrective Measures Assessment for CCR facilities available at https://www.brkenergy.com/ccr/ppw.html

**Recommendations:** Provide any additional recommendations if not included above - specificity is greatly appreciated. We request PacifiCorp to model a range of future coal supply contract costs in response to recent coal company bankruptcies, coal mine purchases, and expiration of coal supply contracts.

We request PacifiCorp to incorporate all anticipated costs associated with CCR cleanup and closure alternatives into IRP modeling.

Please submit your completed Stakeholder Feedback Form via email to IRP@Pacificorp.com

Thank you for participating.